

ICSJWG 2010 Fall Conference

Part 73 and Cyber Security

Perry Pederson
NSIR/DSP
September 2010

"The trouble with quotes on the Internet is that you can never know if they are genuine."

- Abraham Lincoln

Overview



- 10 CFR 73.54, "Protection of Digital Computer and Communications Systems and Networks"
- Regulatory Guide 5.71, "Cyber Security Programs for Nuclear Facilities"
- Cyber Security Plan (CSP) Reviews
- Path Forward

10 CFR 73.54



- High-level, Performance-Based, Programmatic
- FOCUS: Protection against malicious acts
 - To prevent radiological sabotage
 - Other NRC regulations address safety during design
- Generic (i.e., not reactor-specific)
- Consistent with regulatory approach for physical security

10 CFR 73.54



Scope of the rule:

- Protect those systems that fall within the scope of the rule from cyber attacks up to and including the design basis threat
- Implement defensive architecture
- Apply cyber security controls
- Implement cyber incident response and mitigation programs
- Maintain the program and address new cyber security vulnerabilities

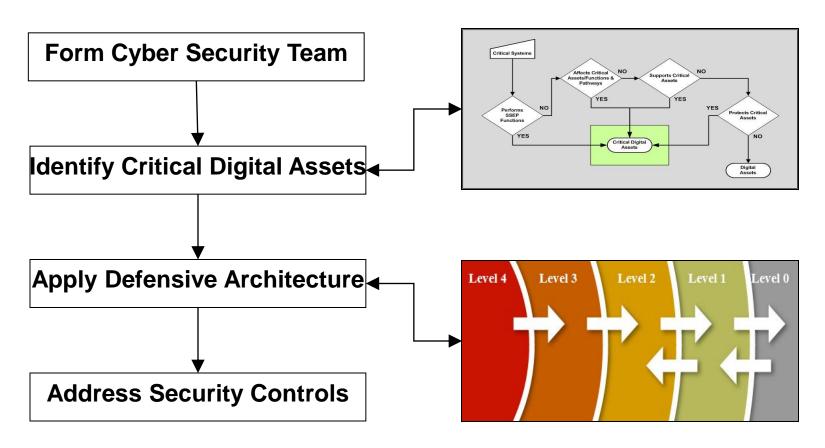
Regulatory Guide 5.71



- Components
 - Main Body
 - Appendix A (generic Cyber Security Plan template)
 - Appendix B (technical security controls)
 - Appendix C (operational/management security controls)
- Performance-Based, Programmatic
 - Consistent with NIST recommendations
 - Flexible and minimally prescriptive
 - Burden on licensees to establish effective programs
- Alignment with Regulatory Guide 1.152,
 "Criteria for Digital Computers in Safety Systems of Nuclear Power Plants"

Regulatory Guide 5.71



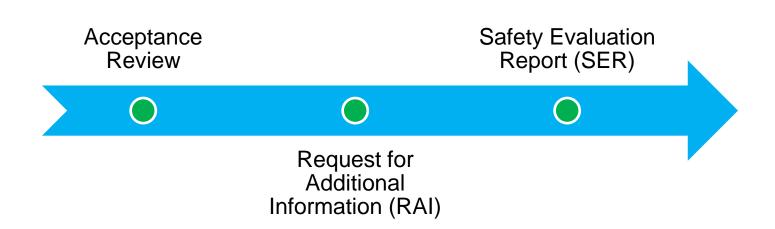


- 1. Address each control for each CDA
- 2. Or, apply alternative measures
- 3. Or, explain why a control is N/A

CSP Reviews



- Currently operating nuclear power plant sites (65) have submitted their CSPs
- All have been "acceptable" for review
- Requests for additional information (RAIs) are being generated



Path Forward



Additional guidance

- Development of NUREG
 - Explains the intent, purpose and objectives of the security controls
 - Provides the technical bases for inspection procedures
 - Industry will have a chance to comment (early 2011)

Inspection

- Inspection procedures completed by early 2011
 - Industry participation will be requested
 - Pilot Plant(s)
 - Workshop
- First inspection late 2011
- Prior to fuel being allowed on-site

URLs



- 10 CFR 73.54
 - http://www.nrc.gov/reading-rm/doccollections/cfr/part073/part073-0054.html
- Regulatory Guide 5.71
 - http://adamswebsearch2.nrc.gov/idmws/doccontent.dll?libra ry=PU_ADAMS^PBNTAD01&ID=100060205

"You can avoid reality, but you cannot avoid the consequences of avoiding reality."

- Ayn Rand (1905-1982)



Backup Slides

Regulatory Guide 5.71



- Major Sections of RG 5.71
 - Cyber Security Team
 - Identify Critical Systems (CSs) & Critical Digital Assets (CDAs)
 - Defensive Architecture
 - Security Controls
 - Cyber security Incident Response and Mitigation Program
 - Maintain the Cyber Security Template